

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ZURICH AMERICAN INSURANCE :  
COMPANY, : CIVIL ACTION NO.  
*Plaintiff* :  
 : 5:22-cv-01194-JMG  
v. :  
 :  
MJF TRUCKING, LLC; :  
PENNSYLVANIA NATIONAL MUTUAL :  
CASUALTY INSURANCE COMPANY; :  
BEARTOWN HYDRAULICS, INC.; :  
RONALD L. ZIMMERMAN; MICHAEL J. :  
FREED; AND CAROL L. SCHWARZ, :  
*Defendants* :

## **STIPULATION OF VOLUNTARY DISMISSAL**

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), the undersigned counsel for all parties who have appeared in this action<sup>1</sup> hereby stipulate and agree that this action shall be voluntarily dismissed with prejudice as to all claims, causes of action, and parties, with each party bearing that party's own attorney's fees and costs.

<sup>1</sup> By Order dated July 13, 2022 (ECF # 30), the Court directed the entry of default against Defendants MJF Trucking LLC and Michael J. Freed.

s/ Louis A. Bové

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Date: October 21, 2022

s/ Andrew F. Fick

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Date: October 21, 2022

s/ Bernard T. Kwitowski

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Bernard T. Kwitowski, Esquire  
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Date: October 21, 2022

**CERTIFICATE OF SERVICE**

I, Rex F. Brien, Esquire, hereby certify that I caused the foregoing Stipulation of Voluntary Dismissal to be filed via the Court's ECF system, which electronically served same on all counsel of record on this date.

s/ Rex F. Brien  
REX F. BRIEN, ESQUIRE

Date: October 21, 2022